

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

WANDA HAWKINS

3904 Enders Lane

Bowie, MD 20716

Plaintiff,

v.

**WASHINGTON METROPOLITAN
AREA TRANSIT AUTHORITY,**

600 Fifth Street, N.W.

Washington, D.C. 20001

And

**NATIONAL RAILROAD PASSENGER
CORPORATION**

1 Massachusetts Avenue, N.W.

Washington, DC 20001

Serve: CT Corporation

1010 15th Street, NW

Washington, DC 20005

And

**CLARK CONSTRUCTION GROUP,
LLC**

7500 Old Georgetown Road

Bethesda, MD 20814

Serve: Resident Agent

The Corp. Trust

2405 York Road

#201

Lutherville, MD 21093

Defendants.

8:19-CV-240

Case No. _____

DEFENDANT WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY'S
NOTICE OF REMOVAL

Defendant, Washington Metropolitan Area Transit Authority (“WMATA”), by and through counsel, pursuant to 28 U.S.C. §1446, provides notice of removal of a civil action from the Circuit Court for Prince George’s County. In support of this removal, WMATA states as follows:

1. On or about October 22, 2018, Plaintiff filed a Complaint captioned Wanda Hawkins v. Washington Metropolitan Area Transit Authority, et al in the Circuit for Prince George’s County under Case No. CAL18-38721.
2. WMATA received the Writ of Summons and Complaint in the aforementioned case on January 7, 2019 by certified mail.
3. Copies of the Writ of Summons and Complaint in the aforementioned civil action accompany this Notice of Removal. These documents constitute the only process, pleadings or orders received by WMATA in the action.
4. This is a civil action over which this Court has original jurisdiction, pursuant to Section 81 of the WMATA Compact as codified and set forth in MD CODE ANN, TRANS ART., §10-204(81).

WHEREFORE, WMATA requests that the entire action now pending in the Circuit Court for Prince George’s County be removed to the United States District Court for the District of Maryland.

WASHINGTON METROPOLITAN AREA
TRANSIT AUTHORITY

By Counsel:

/s/ Neal M. Janey Jr.

Neal M. Janey, Jr.

Bar No.: 26800

Assistant General Counsel

WMATA-COUN

600 Fifth Street, N.W.

Washington, D.C. 20001

(202) 962 1067 telephone

(202) 962-2550 facsimile

E-mail: nmjaney@wmata.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of January 2019, a copy of the foregoing Defendant Washington Metropolitan Area Transit Authority's Notice of Removal was mailed, first class mail, postage prepaid to:

1. John R. Webster, Jr., Esquire
THOMAS V. MIKE MILLER, JR., P.A.
P.O Box 364
Dunkirk, Maryland 20754
2. NATIONAL RAILROAD PASSENGER CORP.
1 Massachusetts Avenue, N.W.
Washington, DC 20001
3. CT Corporation
1010 15th Street, NW
Washington, DC 20005
4. CLARK CONSTRUCTION GROUP, LLC
7500 Old Georgetown Road
Bethesda, MD 20814
5. The Corporation Trust
2405 York Road, #201
Lutherville, MD 21093

/s/ Neal M. Janey Jr.

Neal M. Janey, Jr.